<u>REMARKS</u>

Claims 40-42 and 58-60 are pending in the present patent application. Applicant has amended 40 and 58 and respectfully requests reconsideration of claims 40-42 and 58-60 in view of at least the amendments and following remarks.

I. Rejection of Claims 40 - 42 and 58-60 Based on 35 U.S.C. §102

The Examiner has rejected independent claims 40 - 42 and 58-60 under 35 USC 102(e) as being anticipated by Gentner (5,724,595) stating:

Regarding independent claims 40 and 58, refer to Gentner's abstract, figures 2-4, and column 2 (line 63) through column 4 (line 19). Gentner discloses:

"creating a link between a first lexia and a second lexia". See abstract, in which he discloses *creating a link in an original hypertext document to a target hypertext document.*

"displaying said first lexia in a lexia display window on a display screen". See figure 2 (10).

"displaying a graphical element representing said second lexia in a hypermedia work display window on said display screen". See figures 2 and 3—anchor icon.

"selecting a location for an activation area for said link in said lexia display window". See figure 2 (16).

"selecting said graphical element in said hypermedia work display window". See column 3 (top), in which he discloses control icons 18, called the "drag icons", which in the preferred embodiment is a representation of a ship's anchor. Refer also to column 3 (lines 34-55), in which Gentner discloses moving the mouse cursor over the drag target in the control area of the target window and pressing the select button on the mouse.

With respect to the newly added limitation, "wherein said hypermedia display is configured to act on at least said first lexia and said second lexia", the

inclusion of both first and second "lexia" (10 and 12 in figures 2 and 3) with the display window (14) of Gentner inherently shows that the window "acts on" the "first and second lexia". The "act" of displaying both first and second "lexia" constitutes "acting on "them.

Regarding dependent claims 41-42 and 59-60, refer to Gentner's figure 3 (20) and column 3 (lines 51-54), in which he discloses "exacting a label", andin "said link activation area comprises said label"—the title of the target page is inserted into the text of the original page at the location of the mouse pointer.

Applicant respectfully submits that, as amended, claims 40 through 42 and 58 through 60 are not anticipated by prior art cited for at least the reasons detailed below.

A. Rejection of Independent Claims 40 and 58 Over Gentner (5,724,595)

Applicant has amended claims 40 and 58. Applicant respectfully disagrees that independent claims 40 and 58 are anticipated or suggested by Gentner for the following reasons:

Gentner does not teach, suggest or describe a graphical element individually representing each lexia such as described in the present invention. In Gentner the iconic representation (i.e. Ship Anchor icon) generically represents a link's anchor location to a target page. Gentner utilizes the icon as a pushbutton to initiate the creation of a link, by preparing the target information for the link. The icon exists for the user to start the process of creating a link. In Gentner the same icon (e.g. a ship's anchor) is utilized to indicate a link's location to a target document and does not provide a distinctive visual cue of the target page because the icon is a representation of a link rather than a representation of the media work. Gentner does not provide a graphical element that is a

caricature of the target page. In Gentner, the graphical representation is not algorithmically generated to show a target lexia's prominent features. Furthermore, the graphical representation in Gentner is not dynamically updated to reflect eventual modifications to the target lexia. Unlike Gentner, the present invention utilizes an individual graphical representation to represent each lexia regardless of whether a link is to be created or not. The creation of the graphical representation is not dictated by the steps involving the creation of a link, and selecting the graphical representation (e.g. by pressing the graphical representation) does not necessarily start a sequence of creating a link. The graphical representation is first utilized to provide an easy way of viewing the content of a lexia by highlighting the feature (or features) that a user generally utilizes as visual cues in a lexia, while minimizing other features that the user normally ignores. Therefore, Gentner does not teach, suggest or describe a graphical element individually representing each lexia such as described in the present invention.

B. Rejection of Dependent Claims 41-42 and 59-60 Over Gentner (5,724,595)

Applicant respectfully submits that claims 41-42 and 59-60 being dependent upon respective allowable base claims are also allowable for at least the foregoing reasons stated above.

CONCLUSION

For at least the foregoing reasons, Applicant respectfully submits that pending claims 40-42 and 58-60, as amended, are patentably distinct from the prior art of record and in condition for allowance. Applicant therefore respectfully requests that pending claims 40-42 and 58-60 be allowed.

Respectfully submitted,

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MARKED-UP VERSION OF THE CLAIMS

40. CURRENTLY AMENDED) In a computer system, a method for creating a link between a first lexia and a second lexia of a hypermedia work comprising the steps of:

displaying a first lexia in a lexia display window on a display screen;

displaying a graphical element <u>individually</u> representing a second lexia in

a hypermedia work display window on said display screen;

selecting a location for an activation area for a link in said <u>first</u> lexia display window;

selecting said graphical element in said hypermedia work display window.

41. (UNCHANGED) The method of claim 40 further comprising the steps of:

extracting a label for said link activation area from a data field of said lexia;

displaying said label in said lexia display window.

MARKED-UP VERSION OF THE CLAIMS

42. (UNCHANGED) The method of claim 41 wherein said link activation area comprises said label.

58. (CURRENTLY AMENDED) A program storage device readable by a machine, tangibly embodying a program of instructions executable by the machine to perform method steps for creating a link between a first lexia and a second lexia of a hypermedia work, said method comprising the steps of:

displaying a first lexia in a lexia display window on a display screen;

displaying a graphical element <u>individually</u> representing a second lexia in a hypermedia work display window on said display screen;

selecting a location for an activation area for a link in said <u>first</u> lexia display window;

selecting said graphical element in said hypermedia work display window.

59. (UNCHANGED) The program storage device of claim 58 wherein said method further comprises the steps of:

MARKED-UP VERSION OF THE CLAIMS

extracting a label for said link activation area from a data field of said

lexia;

displaying said label in said lexia display window.

60. (UNCHANGED) The program storage device of claim 59 wherein said link activation area comprises said label.